

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

Mahmoud KHALIL,

Petitioner,

v.

DONALD J. TRUMP, in his official capacity as President of the United States; William P. JOYCE, in his official capacity as Acting Field Office Director of New York, Immigration and Customs Enforcement; Yolanda PITTMAN, in her official capacity as Warden of Elizabeth Contract Detention Facility; Caleb VITELLO, Acting Director, U.S. Immigration and Customs Enforcement; KRISTI NOEM, in her official capacity as Secretary of the United States Department of Homeland Security; and MARCO RUBIO, in his official capacity as Secretary of State, and Pamela BONDI, in her official capacity as Attorney U.S. Department of Justice,

Respondents.

Case No. 25-cv-1935 (MEF) (MAH)

MOTION FOR LEAVE TO FILE
BRIEF AS *AMICI CURIAE* IN
SUPPORT OF PETITIONER'S
PETITION FOR WRIT OF HABEAS
CORPUS AND MOTIONS FOR
RELEASE, RETURN, AND A
PRELIMINARY INJUNCTION

PLEASE TAKE NOTICE that 36 INTERFAITH GROUPS, listed in full below, respectfully move before the Honorable Michael E. Farbiarz, United States District Judge at the Martin Luther King Building & U.S. Courthouse, 50 Walnut Street, Newark, NJ, for an order granting leave to file a brief as *amici curiae* in support of petitioner's petition for writ of habeas corpus and pending motions for release, return, and a preliminary injunction in the above-captioned proceeding as soon as practicable. A brief in support of this motion, the proposed *amici curiae* brief, and a proposed order are attached.

List of *Amici Curiae*

The Beacon
Bend The Arc
Berkeley Zen Center
Buddhist Coalition for Democracy
Cece Jones-Davis
Congregation Beit Simchat Torah
Dai Bai Zan Cho Bo Zen Ji
Dharma Heart Zen
The Episcopal Diocese of Long Island
The Episcopal Diocese Of New York
Faithful America
First Spanish United Methodist Church (the People's Church), East Harlem
Heart Circle Zen
Hindus for Human Rights
HopeBuilds, LLC
Immigration Law & Justice New York
Interfaith Center Of New York (ICNY)
Jewish Center For Justice
Jikoji Zen Center
Masjid Al Haram
Mid-City Zen
New Birth Missionary Baptist Church
New Jewish Narrative
New York State Council on Churches
OKC First Church (Oklahoma City)
Pax Christi New York State
Presbytery Of New York City (PCUSA)
Religious Nationalisms Project
Riverside Church, New York
St. Ann & the Holy Trinity Episcopal Church
St. Mary's Episcopal Church, Harlem
T'ruah: The Rabbinic Call for Human Rights
UCC Movement for Palestinian Solidarity (UCC PIN)
Union Theological Seminary
Upaya Zen Center
Village Zendo

Dated: May 21, 2025

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Luna Droubi', with a stylized, cursive script.

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Counsel for *Amici Curiae*